



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

August 17, 2022

**By ECF**

Honorable Judge Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Ndemenoh v. Boudreau, et al.*, No. 20-4492 (RA)

Dear Judge Abrams:

This Office represents Defendants Vincent Boudreau, William C. Thompson, Anthony Laperuta, Wendy Thornton, George Reinhart, and Tanni Baiyda (collectively, “Defendants”) in the above-captioned action. I respectfully write on behalf of Defendants to request an extension of 60-days, from August 19, 2022 to October 18, 2022, to respond to the Second Amended Complaint.

On July 21, 2022, the Court issued an Order which, inter alia, directed Defendants to respond to the Second Amended Complaint by August 19, 2022 (ECF No. 101). An extension of this deadline is necessary because my colleague, Johane Severin, who has represented Defendants in this matter for the last 1½ years, will be leaving this Office later this month. I have accordingly been assigned to take over representation of this matter and need time to review the file and become fully acquainted with the action before I can prepare an appropriate response to the Second Amended Complaint.

This is Defendants’ first request for an extension of the August 19, 2022 deadline to respond to the Second Amended Complaint. Plaintiff’s counsel has consented to this request.

Thank you for your consideration of this request.

August 17, 2022

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Respectfully submitted,

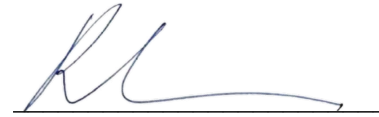
/s/

Mark R. Ferguson  
Assistant Attorney General  
(212) 416-8635

Cc (via ECF): Ataur Raquib, Esq.  
Samuel Christopher Depaola, Esq.

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ronnie Abrams', is written over a horizontal line.

Hon. Ronnie Abrams  
8/18/22